

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

HONORABLE LORI HACKENBERG c/o The Beasley Firm, LLC 1125 Walnut Street Philadelphia, PA 19107	:	
	:	
	:	
	:	
Plaintiff,	:	NO: 4:25-CV-01024
	:	
v.	:	
	:	
DANIEL BOZIN 9663 Santa Monica Blvd #539 Beverly Hills, CA 90210	:	JURY TRIAL OF SIX DEMANDED
	:	
and	:	PLAINTIFF’S COMPLAINT
	:	
BOZIN MEDIA GROUP, LLC, d/b/a BOZIN MEDIA c/o Daniel Bozin, Registered Agent 3054 Village Green Drive Westlake, Ohio 44145-4582	:	
	:	
and	:	
	:	
BOZIN HOLDINGS, LLC c/o Daniel Bozin, Registered Agent 3054 Village Green Drive Westlake, Ohio 44145-4582	:	
	:	
Defendants.	:	

I. INTRODUCTION

1. This lawsuit is due to the defendants’ malicious and pathologically escalating attack on the President Judge of this Commonwealth’s Union and Snyder Counties for signing a bench warrant against him.

2. Defendant Bozin was charged in Snyder County, Pennsylvania with multiple crimes against citizens of this Commonwealth, and he has refused to attend any of the court proceedings.

3. After being duly served with process, Bozin refused to appear, making specious and false claims about service of process to avoid criminal accountability, even though well aware of the hearing dates.

4. Due to Bozin's intentional failure to appear, Judge Hackenberg signed the bench warrant against defendant Bozin. He has still refused to appear at the Snyder County Courthouse to face the charges brought against him.

5. Since that time, Bozin has embarked on a lie-filled attack upon a respected Jurist, demanding the dismissal of the charges against him and, as he has stated in audio messages left by him on the Courthouse's phone system, to "destroy" Judge Hackenberg.

6. Bozin's malicious behavior has caused him to manipulate a grieving mother and her son's unfortunate death to falsely blame Judge Hackenberg for the death (which he has admitted he knows is not true, in recordings left on the Courthouse phone system), while simultaneously attempting to blackmail Snyder County, the court and its judges in an attempt to force them to withdraw the criminal charges against him.

7. Having failed with his threats to have the criminal charges removed, Bozin's knowingly false and malicious attacks increased. Bozin began accusing Judge Hackenberg of corruption, including the hashtag #cashforkids, and causing to be published a "change.org" petition to impeach Judge Hackenberg which has had thousands of views, based upon Bozin's lies, claiming that Judge Hackenberg is receiving illegal payments, akin to the Luzerne County scandal in which judges of that court were imprisoned for taking kickbacks for imprisoning children in for-profit prisons.

8. In a further attempt to harm Judge Hackenberg, Bozin has fabricated claims that Judge Hackenberg's minor daughter has underage drinking parties at their house – which Bozin knows is categorically false – as he pulled stock photos of the Judge's home

from a realtor website, and photos from a bridesmaid weekend at a separate location, to make it appear as though there was underage drinking at their home.

9. Bozin and his “media” companies purposely constructed their malicious campaign to target the President Judge of Union and Snyder Counties, including causing articles to be placed in Snyder County media, and hiring a banner plane to defame Judge Hackenberg.

10. These defamatory attacks arise out of and¹ relate to issues specific to the Commonwealth of Pennsylvania, namely false claims about a Pennsylvania jurist, issues of Pennsylvania law, as well as repeated contact into Pennsylvania for the purposes of destroying Judge Hackenberg’s career and reputation by placing her in a false light that would be offensive to any citizen.

11. Bozin and his business entities involved in this lawsuit specifically targeted their false and malicious attacks for distribution and publication in Snyder and Union counties so as to maximize the impact on Judge Hackenberg and stain her reputation as a Pennsylvania jurist.

12. The defendants’ knowingly false and intentional targeting of Judge Hackenberg is done solely because she signed the Bench Warrant for Bozin’s failure to appear in the criminal matter against him presently pending in Snyder County.

¹ While it is plain that the disjunctive (or) is the appropriate test for jurisdiction, in this case, it both “arises out of and relates to” issues for which this Honorable Court has jurisdiction over this lawsuit. Given the facts the Bozin defendants have “purposefully availed themselves of the privilege of conducting activities within the forum State.” Further, these claims “... arise out of or relate to the defendant’s contacts” with the forum (Pennsylvania). Ford Motor Co. v. Montana Eighth Judicial District Court, 592 U.S. ____ (2021). Given the text, tenor and subject basis for this article, there is plainly a strong “relationship among the defendant, the forum, and the litigation.” The same is true in this lawsuit.

13. The defendants' malicious objectives have, regrettably, been met and Judge Hackenberg has suffered significant and permanent damages for the false light into which the defendants' defamatory actions have placed her.

14. Aside from a clear disregard for due diligence, Bozin's lies, delusions and manipulation of others who have appeared before Judge Hackenberg is a malicious attack upon the character of a dedicated public servant.

15. The false light into which Judge Hackenberg has been placed by these defendants has also caused significant professional, personal, and emotional damages and harm to her.

16. Due to Bozin's revenge-driven lies and his smear campaign against Judge Hackenberg, she is now forever seen as corrupt, causing the death of a child, receiving bribes, and condoning underage drinking in her home, as intended by these defendants. This lawsuit now follows.

II. JURISDICTION AND VENUE

17. This Court has subject matter jurisdiction in this case pursuant to 28 U.S.C. § 1332. The Defendants are citizens of states other than which the Plaintiff is a citizen. The amount in controversy substantially exceeds the requirement for Federal Diversity Jurisdiction and guarantees a jury trial, exclusive of interest and costs.

18. Venue is proper pursuant to 28 U.S.C. § 1391 because all Defendants are subject to the Court's personal jurisdiction with respect to the civil action in question. The Defendants published their defamatory statements in Snyder and Union Counties, Pennsylvania where they targeted their unlawful scheme.

III. PARTIES

19. Plaintiff, The Honorable Lori Hackenberg, is an individual, jurist, and attorney in good standing, admitted in 2003 and first elected to the bench in 2011, and elected to the Court of Common Pleas in 2021; she is also a citizen of the Commonwealth of Pennsylvania.

20. Defendant Daniel Bozin was, at all relevant times, the publisher and creator of the lies, fabrications, and malicious attacks on Judge Hackenberg to punish her for signing the Bench Warrant for his failure to appear for his criminal matter in Snyder County. Bozin is also the registered agent for the co-defendant “media” companies involved in publishing the defamatory attacks on Judge Hackenberg at issue in this lawsuit.

21. Defendant, Bozin Media Group, LLC, d/b/a Bozin Media, is an active, Ohio limited liability company that claims to be a media entity through which Bozin publishes his lies and attacks on Judge Hackenberg. Bozin is the registered agent for Bozin Media Group, LLC.

22. Defendant, Bozin Holdings, LLC, is an active, Ohio limited liability company that claims to be a media entity through which Bozin publishes his lies and attacks on Judge Hackenberg. Bozin is the registered agent for Bozin Holdings, LLC.

23. The “Bozin defendants” are Bozin, Bozin Media Group, LLC, d/b/a Bozin Media, and Bozin Holdings, LLC.

IV. FACTS

24. On 20 November 2023, a criminal complaint was filed in Snyder County, Pennsylvania against Defendant Bozin, charging him with criminal harassment and

stalking of a Geisinger employee,² MDJ 17-3-03 (Snyder County Mag. District Court). Bozin was served via certified and regular mail pursuant to 234 Pa. Code Rule 511. Bozin failed to appear for his 7 December 2023 required fingerprinting and photographing, and he also failed to appear for his preliminary hearing, scheduled to occur on 18 January 2024.

25. Bozin's repeated flaunting of Pennsylvania's criminal justice system continued, and a Bench Warrant was issued on 1 February 2024; it was at this point that this defendant and President Judge Hackenberg's paths crossed, as Judge Hackenberg signed the Bench Warrant against Bozin.

26. Bozin ignored this Bench Warrant and he also refused to appear for his formal arraignment, scheduled to occur 29 April 2024.

27. In spite of these multiple transgressions of Pennsylvania's criminal laws, Judge Hackenberg did not issue a second Bench Warrant against Bozin.

28. At the same time, a sad, but all too common, custody dispute was before Judge Hackenberg, captioned L.J.G. v. E.B., which at its core dealt with the custody arrangements regarding a little boy, A.G., conceived during a short marriage.

29. The complexity of this custody dispute involved the father, an oncologist, relocating due to work to Florida, and the mother, who divided her time between Israel and central Pennsylvania. Ultimately, Judge Hackenberg ruled, and the appellate courts affirmed, that the father would have primary custody.

² As described in the Affidavit of Probable Cause, Bozin was seeking to become involved in the medical care of a minor, including attempting to obtain the medical records of this minor for which he was not a parent or legal guardian. As a result of this improper behavior, his access to the "mychart" at Geisinger was revoked. That provoked Bozin's wrath against the Geisinger employees, which resulted in the criminal charges.

30. The mother, E.B., was unhappy with the Court's decision and continued the appeals *pro se*; even though Judge Hackenberg's opinions were upheld by the appellate courts, E.B. began to attack Judge Hackenberg with various false accusations, including claims of antisemitism and bias, which the Superior Court specifically addressed in footnote two of its 21 February 2024 opinion:

² Mother's call for President Judge Hackenberg's recusal and transfer of venue has been recycled at every turn, including for a third time on appeal before this Court. We note that Mother has made various accusations of bias and prejudice against not only President Judge Hackenberg, but also against Judge Michael Hudock, who formerly presided over the custody matter, against the court-appointed parenting coordinator and former judge, Lori Seratelli, and against the court-appointed custody evaluator. Accusations of bias or antisemitism, without any basis, are inappropriate and dangerous, and we remind Mother that a ruling against her is not evidence of either.

31. Tragically, on 2 March 2024, A.G. passed away from natural causes, having suffered from severe gastrointestinal issues for which his father took him to the hospital. A full investigation by the Polk County Sheriff's office, including a discussion with E.B., who was living in Israel at the time, revealed that the father had kept E.B. abreast of A.G.'s illness, and found no evidence of foul play.

32. The sheriff also noted the extreme trauma from which E.B. was suffering that occasions parents when their children prematurely pass.

33. The Polk County investigation found no fault with this tragic death, defined the cause of death as natural, and ended its investigation. No one has claimed that the Polk County investigation was in any way flawed or biased.

34. E.B.'s suffering from the loss of her child continued, and Bozin saw this, and E.B.'s dislike of Judge Hackenberg due to the nature of her rulings, as a Machiavellian

method to manipulate E.B.'s unimaginable pain to attack Judge Hackenberg for her signing the bench warrant against him.

35. Almost immediately after the 29 April 2024 arraignment Bozin began leaving voice messages at the Snyder and Union County Courthouses, threatening to use his "media" companies to "kill" Judge Hackenberg's career if the criminal case against him was not "dismissed, sealed and destroyed."

36. As to using E.B., Bozin left another voice message for Judge Hackenberg in which he acknowledged that Judge Hackenberg was not responsible for A.G.s passing:³

Then you have your daughter on Facebook trying to make comments, and she's more concerned about the color of her sweater than a kid dying.

Now, I understand the mother is emotional.

I also understand that you made a decision, and you can't foresee that, although the choice was that people are making about you Lori, in your own town, cunt is one word that was describing you.

37. Bozin's acknowledgement and admissions in this voice message that E.B. is emotional and that Judge Hackenberg could not foresee the tragic passing did not stop him from using E.B., and amplifying her trauma, to create a campaign of lies that Judge Hackenberg is responsible for A.G.'s death, and that she is taking bribes and kickbacks that result in the death of children.

38. Bozin and his "media" entities, including "Bozin media" continued to use E.B. and her tragedy to punish and defame Judge Hackenberg; Bozin's despicable yet calculated use of E.B.'s tragedy to create a smear and pressure campaign against Judge Hackenberg escalated.

³ This did not stop Bozin from beginning his campaign of harassing Judge Hackenberg's family using her daughter as a tool to blackmail and punish her.

39. Bozin has and continues to publish #stopthehack via his fightcorruptionpa.com website, and social media, again repeating the knowingly false narrative that Judge Hackenberg is responsible for A.G.'s death, that Judge Hackenberg is corrupt and takes bribes, and that she must be impeached.

40. Some of the outrageous and knowingly false claims Bozin makes against Judge Hackenberg (while grifting donations) and obtaining signatures for his sham petition is that the “tragic loss of six year old Adam Gitter reveals the dire consequences of bias and corruption” in support of this petition with this URL:

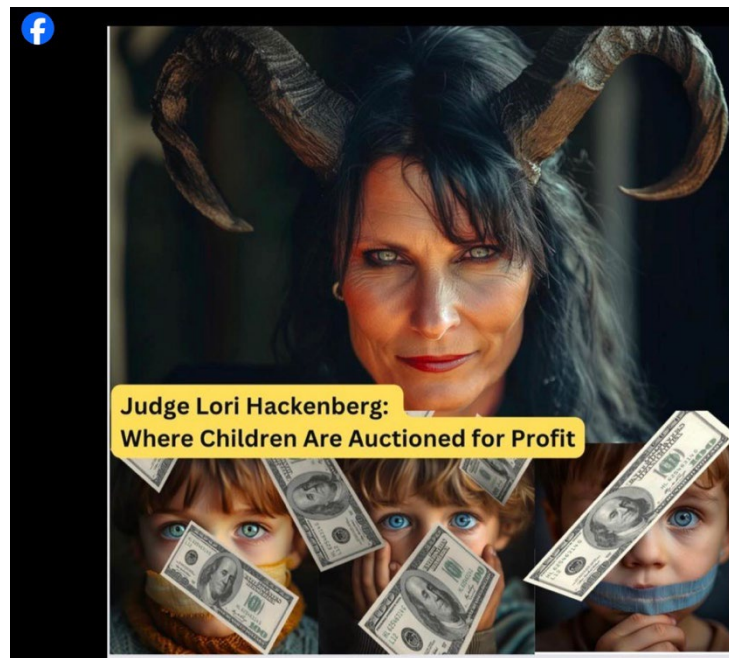
<https://www.change.org/p/impeach-judge-lori-hackenberg-of-union-and-snyder-counties-pa>

41. Bozin's continuously published attacks on Judge Hackenberg exist today via Bozin's “fightcorruptionpa.com” website, and its facebook social media page, which is still linked to and includes a “change.org” petition to impeach Judge Hackenberg which is titled “Hackenberg is responsible to Adam's death” and has bloody handprints and blood spattering added to a photo of the judge. An image from that page is similar to this facebook rendering calling Judge Hackenberg a “murderer”:



42. Bozin and his “media” companies have also repeatedly published the hashtags #kidsforcash, #courtcorruption, #endjudicialabuse, and #savekids, among others, all linking back to the defamatory publications about Judge Hackenberg.

43. Bozin’s manipulation of the “Impeach Lori Hackenberg” social medial page includes promoting these malicious images, claiming that Judge Hackenberg “auctions” children for profit (akin to their #kindsforcash claims):



This malicious and knowingly false publication, paid for by “Bozin Media Group” is also propagated by these defendants:



Impeach Judge Lori Hackenberg of Union and Snyder Counties, PA · Follow
August 8, 2024 · 🌐



44. The Bozin defendants’ reckless and malicious attacks on Judge Hackenberg have escalated as his demands to have his criminal case dismissed have gone ignored.

45. Bozin has increased these attacks on Judge Hackenberg’s minor daughter, spreading the knowing falsity that Judge Hackenberg holds underage drinking parties at her house. Bozin threatened in one of the voice messages to put an ad out to harm her daughter:

And I hope your daughter is really, really clean. Like I said, my client does go to school with her and I put her -- I'll put an ad out, and I'll pay \$5,000 to the first kid that gets me a picture of her drinking or smoking pot, and that'll be -- and I'll pay the 1,500 to put it in the front page, or get a full page ad in the daily item. I got the money.

46. Bozin also attempted to blackmail Judge Hackenberg with these fabricated claims, claiming that he would make a video about her daughter, but “...it depends on how everything works out” in his criminal case:

So you're aware pictures were provided to me. It actually looks like it's a wedding celebration, specifically, about a year and a half ago. She was 15, I believe she's 16 now. It's a lot of pressure for me to actually make a video about this, and I've been very reluctant to do it.

But it depends on how everything works out in this csae. I've been at it with the district attorney.

47. Bozin re-published his defamatory claims by hiring an aircraft with a banner to fly over a Snyder County Night Out, which read “impeach Judge Hackenberg – fight-corruptionpa.com” to re-publish and broadcast his admittedly false claims that Judge Hackenberg is somehow responsible for A.G.s death, and that she is corrupt.

48. Bozin and his “media” companies have consistently acted recklessly and with actual malice, using the trauma that will forever haunt E.B. as a malicious tool to punish and destroy Judge Hackenberg for her involvement in his criminal matter.

49. Bozin knows that Judge Hackenberg’s rulings were proper, affirmed by the Pennsylvania appellate courts, and that A.G.’s death was unforeseeable and not related in any way to the rulings.

50. Yet, because the Snyder County court would not “dismiss, seal and destroy” the proper criminal complaint against Bozin for his illegal actions at Geisinger, he has used these knowingly false claims to destroy Judger Hackenberg’s career and reputation.

51. The defendants intentionally disregarded and withheld from their readers the truth, as admitted by Bozin, that Judge Hackenberg had nothing to do with A.G.’s death, and that her rulings were consistently upheld and appropriate.

52. Bozin’s intentional disregard and suppression of these undisputed and critical facts that were known to him is not just negligence; it is an intentional and malicious scheme and plot to smear Judge Hackenberg due to his rage and fury about being held accountable for his crimes at Geisinger, and ensure all readers of his false publications will believe that Judge Hackenberg is corrupt, places the lives of children at risk, and accepts bribes and kickbacks.

53. Bozin and his “media” companies’ escalation of these falsehoods were published and republished in a malicious and reckless manner with the intent to harm Judge Hackenberg’s reputation.

54. Given the absolute lack of any evidence supporting any of the allegations against Judge Hackenberg, and the defendants’ intentional disregard and suppression of critical facts that had revealed to them and would reveal to the average reader that Judge Hackenberg was not corrupt, does not accept bribes, and was not responsible for A.G.’s death, it is plain that this misconduct rises well beyond mere negligence and was done with actual malice and with reckless disregard for the truth. See, e.g., Moore v. Vislosky, 240 Fed. Appx. 457, 469 (3d Cir. 2007) (“[defendant’s] awareness that there was no basis for making the specific allegations of wrongdoing that were leveled against [plaintiffs],” if proven, would establish actual malice).

V. THEORY OF LIABILITY/CAUSE OF ACTION

COUNT I FALSE LIGHT JUDGE HACKENBERG v. BOZIN DEFENDANTS

55. Plaintiff incorporates herein by reference each and every preceding paragraph of this Complaint as if each were set forth fully herein.

56. Bozin and his “media” companies, on their own and also conspiring with others, published the above-mentioned articles with its statements, innuendos and implications to individuals in Snyder and Union Counties, and throughout Pennsylvania, who understood the statements, innuendos and implications to place Judge Hackenberg in a false light with the public.

57. The Bozin defendants used the knowingly false smears and claims identified in this Complaint to punish a jurist who had the audacity to sign a bench warrant against

a man who has criminally harassed and stalked healthcare providers who stopped him from manipulating a minor over whom he had no parental or other rights.

58. The aforementioned false light in which Judge Hackenberg was placed would be highly offensive to a reasonable person.

59. As described above, the Bozin defendants had knowledge of, or acted with reckless disregard as to, the falsity of the matter they communicated and the false light in which Judge Hackenberg was placed.

60. The publications have caused Judge Hackenberg irreparable harm to her reputation and career as well as causing mental suffering, shame, humiliation, physical and emotional distress.

61. As a direct and proximate cause of the Defendants' malicious, intentional, or reckless conduct as set forth above, Judge Hackenberg is entitled to such damages that will compensate for her injuries, including punitive damages to punish the Defendants for their conduct, and deter them and others similarly situated from similar acts in the future.

62. Judge Hackenberg seeks compensatory and punitive damages as a result of the Bozin defendants' deliberate, reckless and outrageous conduct set forth above.

WHEREFORE, Plaintiff demands judgment against all defendants, jointly, severally and/or individually, in an amount substantially in excess of the jurisdictional limit, compensatory damages, punitive damages, attorneys' fees, costs and interest, together with any further relief which this Court deems just and appropriate under the circumstances.

NOTICE OF PRESERVATION OF EVIDENCE

PLAINTIFF HEREBY DEMANDS AND REQUESTS THAT DEFENDANTS TAKE NECESSARY ACTION TO ENSURE THE PRESERVATION OF ALL DOCUMENTS, COMMUNICATIONS, WHETHER ELECTRONIC OR OTHERWISE, ITEMS AND THINGS IN THE POSSESSION OR CONTROL OF ANY PARTY TO THIS ACTION, OR ANY ENTITY OVER WHICH ANY PARTY TO THIS ACTION HAS CONTROL, OR FROM WHOM ANY PARTY TO THIS ACTION HAS ACCESS TO, ANY DOCUMENTS, ITEMS, OR THINGS WHICH MAY IN ANY MANNER BE RELEVANT TO OR RELATE TO THE SUBJECT MATTER OF THE CAUSES OF ACTION AND/OR THE ALLEGATIONS OF THIS COMPLAINT.

DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial of six.

THE BEASLEY FIRM, LLC

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Dated: 6 June 2025